

1 James E. Doroshow (SBN 112920)
jdoroshow@foxrothschild.com
2 FOX ROTHSCHILD LLP
1800 Century Park East, Suite 300
3 Los Angeles, CA 90067-1506
Telephone: 310-598-4150
4 Facsimile: 310-556-9828

5 Attorneys for Defendants,
NATIONAL MEDIA CONNECTION, LLC, NATIONAL
6 MORTGAGE HELP CENTER, LLC, AND MATTHEW
S. GOLDREICH
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 NEIGHBORHOOD ASSISTANCE
12 CORPORATION OF AMERICA, a
Massachusetts corporation,

13 Plaintiff,

14 v.

15 NATIONAL MEDIA CONNECTION,
16 LLC, a Connecticut limited liability
company, THE NATIONAL
17 MORTGAGE HELP CENTER, LLC, a
Connecticut limited liability company, and
18 MATTHEW S. GOLDREICH, an
individual,

19 Defendants.
20

Case No.: CV-13-01698-CRB

Hon. Judge Charles R. Breyer

**STIPULATION RE RESPONSE
DEADLINE AND ORDER**

Date Complaint Filed: 4/15/13

1 Plaintiff Neighborhood Assistance Corporation of America (“Plaintiff”) and
2 Defendants National Media Connection, LLC, National Mortgage Help Center, LLC,
3 and Matthew S. Goldreich (“Defendants”) hereby stipulate and agree as follows:

4 **STIPULATION**

5 WHEREAS Plaintiff filed its Complaint against Defendants on April 15, 2013;

6 WHEREAS the parties previously stipulated and agreed that each Defendant
7 was served with the Summons and Complaint and that such service was deemed to
8 have occurred on May 1, 2013;

9 WHEREAS the parties previously agreed that Defendants’ response to the
10 Complaint would be due on May 28, 2013; and

11 WHEREAS the parties are now engaged in settlement discussions which may
12 result in a complete resolution of this entire litigation, and now wish to avoid the time
13 and expense of litigating this action while such settlement discussions are ongoing;

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
15 between the parties hereto and their respective undersigned attorneys as follows:

16 1. The last day for Defendants to file a responsive pleading to the
17 Complaint is extended from May 28, 2013 to June 18, 2013; and

18 2. By entering into this Stipulation Defendants do not waive any challenges
19 they may wish to make to the jurisdiction and/or venue of this Court, should this
20 matter not settle.

21
22
23 Dated: May 24, 2013

FOX ROTHSCHILD LLP

24
25 By: /James E. Doroshow/

James E. Doroshow
Attorneys for Defendants,
NATIONAL MEDIA CONNECTION, LLC,
NATIONAL MORTGAGE HELP CENTER, LLC,
AND MATTHEW S. GOLDREICH
26
27
28

STIPULATION

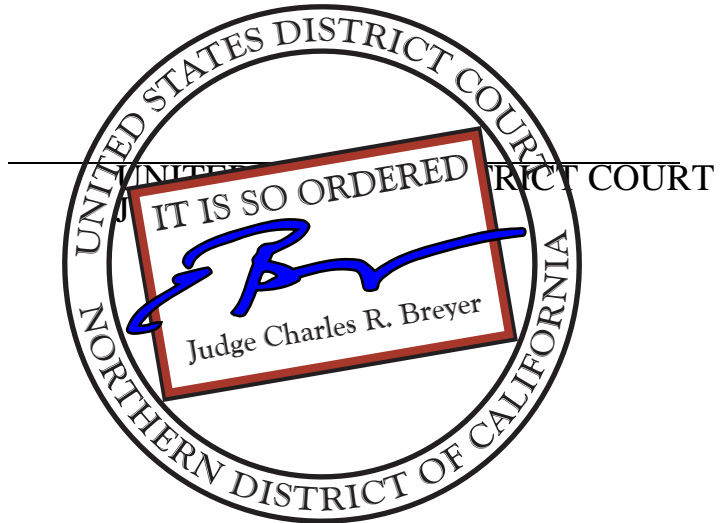
1 Dated: May 24, 2013

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

2
3 By: /Christopher J. McNamara/
4 Christopher J. McNamara
5 Attorneys for Plaintiff,
6 NEIGHBORHOOD ASSISTANCE
7 CORPORATION OF AMERICA

8
9 SO ORDERED:

10 Dated: May 29, 2013



STIPULATION